

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Haitham Hussein DAOUD

Case: 2:24-mj-30442

Assigned To : Unassigned

Assign. Date : 10/15/2024

Case No.

Description: RE: HAITHAM
HUSSEIN DAOUD (EOB)

CRIMINAL COMPLAINT

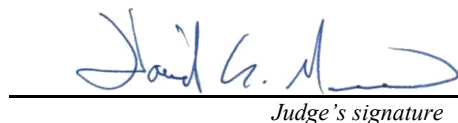
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 26, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: October 14, 2024City and state: Detroit, Michigan
Complainant's signatureTask Force Officer Kylie Churches - ATF
Printed name and title
Judge's signatureHonorable David R. Grand, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Kylie Churches, Task Force Officer for the Bureau of Alcohol, Tobacco, Firearms and Explosives, being duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I have been a police officer with the Detroit Police Department (DPD) in Detroit, Michigan for approximately five years. In March 2022, I was assigned as a Task Force Officer for the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I am currently assigned to the ATF Detroit Field Division. I have had extensive law enforcement training at the DPD Training Center. I obtained a bachelor's degree in criminal justice in 2017. During my employment with the ATF, I have conducted and/or participated in numerous criminal investigations involving the possession, use, and trafficking of firearms, drug trafficking violations, and criminal street gangs. I have also received training on undercover investigations, cooperating sources, and surveillance techniques.

2. This affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and an arrest warrant for Haitham DAOUD for violating 18 U.S.C. § 922(g)(1), felon in possession of a firearm.

3. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or

other law enforcement officers, communications with others who have personal knowledge of the events and circumstance described herein, review of reports by myself and/or other law enforcement officers, and information gained by my training and experience. This affidavit is intended to show that there is sufficient probable cause for the requested complaint and warrant and does not set forth all information known to law enforcement regarding this investigation.

II. PROBABLE CAUSE

4. In the afternoon of September 26, 2024, a Detroit Police Department (DPD) patrol unit was on routine patrol around Fenkell Street and Chapel Street in Detroit, Michigan. The officers observed a white 2005 Dodge Grand Caravan and, after running the Michigan license plate in the Law Enforcement Information Network (LEIN), determined the vehicle had no insurance. The officers activated the patrol car's emergency lights to conduct a traffic stop and pulled behind the vehicle at an Amoco gas station. When officers approached the vehicle, the driver, later identified as Haitham DAOUD, exited the driver's side door and began to walk away from the officers. The officers requested DAOUD to step in front of their patrol car, but DAOUD fled on foot, running east from the gas station. Officers apprehended DAOUD and placed him in handcuffs.

5. One of the officers observed multiple live rounds of ammunition on the ground where DAOUD was detained. The officers conducted a pat down

search of DAOUD and recovered a black Smith and Wesson MP9 handgun, 9mm, bearing serial number HSM6699 and a magazine containing numerous live rounds, from DAOUD's waistband, tucked into his underwear. Per LEIN, DAOUD did not possess a valid Michigan concealed pistol license. DAOUD was arrested for felony weapons possession and obstructing police.

6. Special Agent Kara Klupacs, an ATF Interstate Nexus Expert, reviewed the DPD reports and concluded, based on her training and experience, that the recovered Smith and Wesson MP9 handgun was not manufactured in the State of Michigan and, therefore, traveled in and affected interstate and/or foreign commerce.

7. DAOUD has the following criminal history:

- On or about November 4, 2014, DAOUD was arrested and charged with the felony offense Controlled Substance – Possess (Cocaine, Heroin, or another Narcotic) <25 grams. DAOUD pleaded guilty as charged in the Sixth Judicial Circuit Court, Oakland County, Michigan and was sentenced to 198 days in jail, 40 days probation, and six months license suspension on December 8, 2014.
- On or about December 17, 2015, DAOUD was arrested and charged with felony Uttering and Publishing and Felony Weapons – Carrying Concealed. DAOUD pleaded guilty to Uttering and Publishing (Attempt) and Weapons –Carrying Concealed on January 14, 2016, in the Third Judicial Circuit Court, Wayne County, Michigan and was sentenced to two years of probation on March 16, 2016.
- On or about June 8, 2016, DAOUD, while on probation, was arrested and charged with multiple felony firearms offenses in

Detroit, Michigan. On August 26, 2013, DAOUD pleaded guilty to Felony Weapons – Carrying Concealed in the Third Judicial Circuit Court, Wayne County, and was sentenced to 1-5 years in the custody of the Michigan Department of Corrections (MDOC) on September 13, 2016.

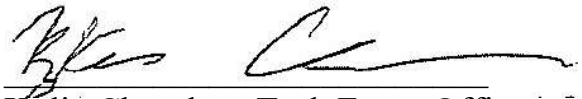
- On or about August 22, 2018, DAOUD was arrested and charged with felony offense Police Officer – Fleeing (Third Degree) and Felony Weapons – Felony Firearm. On November 20, 2018, DAOUD was convicted nolo contendere of both felonies in the Third Judicial Circuit Court, Wayne County. On December 10, 2018, DAOUD was sentenced to 6 months to 5 years imprisonment for Police Officer – Fleeing (Third Degree) and 2 years imprisonment for Felony Weapons – Felony Firearm.
- On or about October 2, 2021, while on parole, DAOUD was arrested and charged with multiple felony firearms offenses and obstructing police. On May 15, 2022, DAOUD pleaded guilty to Weapons – Felony Firearm in the Third Judicial Circuit Court, Wayne County, and was sentenced to 2 years imprisonment on June 9, 2022. On June 11, 2024, DAOUD was released on a one-year period of parole.

8. From my review of DAOUD's criminal history, there is probable cause to believe DAOUD is a convicted felon and has been convicted of violations that were punishable by more than one year in prison. Based on my training and experience, defendants are warned of the maximum penalty when they enter a plea of guilty to a felony. Defendants are also advised that they are pleading guilty to a felony. Additionally, I reviewed records from the MDOC, including Form CSJ-290 signed by DAOUD on June 9, 2024, which informed him in writing that he is a felon and prohibited from possessing firearms or ammunition. Due to the recency

of DAOUD's felony convictions, the fact that he has been convicted of seven prior felonies and has served in time in MDOC custody for more than one year on multiple occasions, there is probable cause to believe that DAOUD knows that he has been convicted of a crime punishable by more than one year in prison.

III. CONCLUSION

9. Based on the above facts, there is probable cause to believe that on September 26, 2024, in the Eastern District of Michigan, Haitham DAOUD, a convicted felon, knowingly possessed a firearm, manufactured outside the State of Michigan, after having been convicted of a felony offense, and knowing that he was a felon and prohibited from possessing any firearms or ammunition, all in violation of 18 U.S.C. § 922(g)(1).



Kylie Churches, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Hon. David R. Grand
United States Magistrate Judge

Dated: October 14, 2024